

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff

v.

KIMBERLEE PITAWANAKWAT

Defendant

5:20-CR-50122

MOTION TO COMPEL FED. R. CRIM. PRO.
16 DISCOVERY, TIMELY BRADY
DISCLOSURE AND FOR ADDITIONAL
RELIEF

Kimberlee Pitawanakwat
26214 Foster Road
Monroe, OR 97456
kimberlee.pitankwt@gmail.com

EXHIBIT C

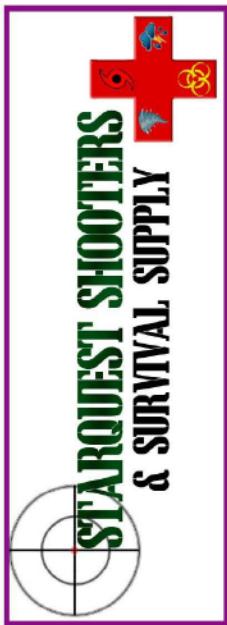
FIREARM VIOLATIONS

When	Where (Venue)	What
10/12/2018	D. Del.	18 USC § 922(a)(6)

Hunter committed a felony on 10/12/2018 by lying on the Bureau of Alcohol, Tobacco, and Firearms (ATF) Form 4473. Before he could purchase a .38 revolver at Ron Palimere's¹⁴⁹⁶ Starquest Shooters & Survival Supply gun shop, Hunter needed to satisfy the requirements listed on the ATF's "Firearms Transaction Record." Hunter answered "No" to the following question: "Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance? ... The use or possession of marijuana remains unlawful under Federal law..."¹⁴⁹⁷ Contemporaneous photos¹⁴⁹⁸ confirmed that Hunter was in the Wilmington area and that he had ingested crack cocaine.



Ron Palimere
DOB: 06/07/1976
FBI#: 8-51-003-01-5E-00996



U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0920

Firearms Transaction Record

WARNING: You may not receive a firearm if prohibited by Federal or State law. The information you provide will be used to determine whether you are prohibited from receiving a firearm. Certain violations of the Gun Control Act, 18 U.S.C. 921 et. seq., are punishable by up to 10 years imprisonment and/or up to a \$250,000 fine.

Read the Notices, Instructions, and Definitions on this form. Prepare in original only at the licensed premises ("licensed premises" includes business temporarily conducted from a qualifying gun show or event in the same State in which the licensed premises is located) unless the transaction qualifies under 18 U.S.C. 922(c). All entries must be handwritten in ink. "PLEASE PRINT."

Section A - Must Be Completed Personally By Transferee/Buyer

1. Transferee's/Buyer's Full Name (If legal name contains an initial, record "JO" after the initial. If no middle initial or name, record "NAM".) Last Name (Including suffix (e.g., Jr, Sr, II, III)) First Name Middle Name
BIDEN ROBERT HUNTER

2. Current State of Residence and Address (U.S. Postal abbreviations are acceptable. Cannot be a post office box.) Number and Street Address City County State ZIP Code
Wilmington New Castle DE 19807

3. Place of Birth U.S. City and State OR Foreign Country
WILMINGTON DE

4. Height 5. Weight 6. Sex 7. Birth Date
5'6" 175 Male 11-16-1971

8. Social Security Number (Optional but will help prevent misidentification)

9. Unique Personal Identification Number (UPIN)⁴ (Applicable (See Instructions for Question 9.)

10.a. Ethnicity
 Hispanic or Latino Not Hispanic or Latino American Indian or Alaska Native Black or African American White
 Asian Native Hawaiian or Other Pacific Islander

10.b. Race (In addition to ethnicity, select one or more race in 10.b. Both 10.a. and 10.b. must be answered.)
 African American Asian American Indian or Alaskan Native Black or African American Hispanic or Latino Not Hispanic or Latino White

11. Answer the following questions by checking or marking "yes" or "no" in the boxes to the right of the questions.

a. Are you the actual transferee/buyer of the firearm(s) listed on this form? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are not required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.)

b. Are you under indictment or information in any court for a felony, or any other crime for which the judge could imprison you for more than one year? (See Instructions for Question 11.b.)

c. Have you ever been convicted in any court of a felony, or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation? (See Instructions for Question 11.c.)

d. Are you a fugitive from justice? (See Instructions for Question 11.d.)

e. Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance? Warning: The use or possession of marijuana remains unlawful under Federal law regardless of whether it has been legalized or decriminalized for medicinal or recreational purposes in the state where you reside.

f. Have you ever been adjudicated as a mental defective OR have you ever been committed to a mental institution? (See Instructions for Question 11.f.)

g. Have you been discharged from the Armed Forces under dishonorable conditions?

h. Are you subject to a court order restraining you from harassing, stalking, or threatening your child or an intimate partner or child of such partner? (See Instructions for Question 11.h.)

i. Have you ever been convicted in any court of a misdemeanor crime of domestic violence? (See Instructions for Question 11.i.)

12.a. Country of Citizenship: (Check/List more than one, if applicable. Nationals of the United States may check U.S.A.)
 United States of America (U.S.A.) Other Country/Countries (Specify):

12.b. Have you ever renounced your United States citizenship?
 Yes No

12.c. Are you an alien illegally or unlawfully in the United States?
 Yes No

12.d.1. Are you an alien who has been admitted to the United States under a nonimmigrant visa? (See Instructions for Question 12.d.)
 Yes No

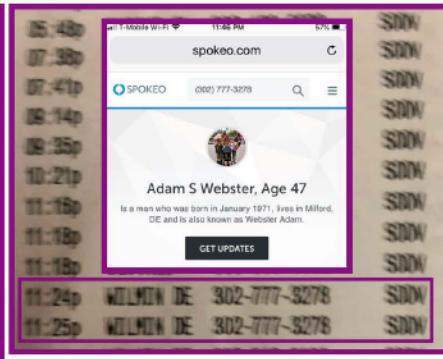
12.d.2. If "yes", do you fall within any of the exceptions stated in the instructions?
 Yes No

13. If you are an alien, record your U.S.-Issued Alien or Admission number (AR#, USCIS#, or I-94#):

Previous Editions Are Obsolete
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Transferee/Buyer Continue to Next Page
STAPLE IF PAGES BECOME SEPARATED

ATF Form 4473 (5300-9)
Revised October 2016



Apple iPhone 8 Plus_N39.6515W75.7501_20181011.jpg



¹⁴⁹⁶ "Ron Palimere," LinkedIn, archive.ph/d6s3o & archive.ph/wSOt0

archive.ph/8FXJY

¹⁴⁹⁷ Jon Levine, "Hunter Biden begged Hallie for cash to go to rehab before gun buy," *New York Post*, October 2022, archive.ph/J2udH

¹⁴⁹⁸ "The night before he bought the gun, Hunter was at Hallie's place trawling through her ... phone. He took forty-nine photographs of the Caller ID display showing incoming numbers ... Late that night he was looking up phone numbers on Spokeo.com and found a forty-seven-year-old man from a nearby suburb. He added the screenshot to his photo roll." See Miranda DEVINE, "Laptop from Hell," *Post Hill Press*, November 2021, archive.is/683Jm & archive.ph/s70Rq

When	Where (Venue)	Who (Accomplice)	What
10/23/2018ff	D. Del.	Hallie Olivere Biden	18 USC § 922(q)(2)(A) & 11 Del. C. §§ 1245A, 1442, 1456, 1457

Although the felony that Hunter committed by submitting false¹⁴⁹⁹ information on a firearm purchase form is prosecuted only half the time, Hunter's lie created other headaches for him and the Bidens. Hunter described those headaches in an iMessage to his former psychiatrist on 12/06/2018: "Did I tell you what she [Hallie] did with my [...]38 [revolver][?] ... [she] [t]ook [the gun] from [the] lock box of [my] truck and put it IN [a] PapER BAG AND Threw it in [a] trash can at [a] local high end grocer [Janssen's Market]. For no reason. And I freaked when I saw it was missing 10 minutes after she took it and when she went back to get it after I scared the shit out of her it was gone[,] which led to [a] state police investigation¹⁵⁰⁰ of me. True story." Hunter's psychiatrist understood that, despite Hallie's attractive physique (in his mind), she committed crimes: "[Hallie] tossed out a gun where a kid could have blown his sister's head off ... Whether she is built like a greyhound or not becomes irrelevant."

To: keith ablow▼

✓ +1 (646) 642-5032

No

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Did I tell you what she did with my 38 8:42 PM

True story 8:42 PM

Tell you tomorrow 8:42 PM

Took from lock box of truck and put it IN PapER BAG AND Threw it in trash can at local high end grocer. For no reason. And I freaked when I saw it was missing 10 minutes after she took it and when she went back to get it after I scared the shit out of her it was gone which led to state police investigation of me. True story. 8:45 PM

She has a "thing" for putting dangerous stuff in garbage cans 8:47 PM

Your stuff 8:47 PM

Hmmmm 8:47 PM

But really on top of the full open trash can 8:47 PM

I am sure you two have intimacies and pages of your shared life stories that bind you together, but, really, she seems rather ill-equipped to both love you and command your attention/respect/admiration, etc. You're avoiding being the chosen one, because you were not the chosen one, by your step-mother. 8:52 PM

She went golfing 8:52 PM

Done and done 8:53 PM

She threw the drugs in the waste paper basket beside the bed. 8:53 PM

She tossed out a gun where a kid could have blown his sister's head off 8:53 PM

Whether she is built like a greyhound or not becomes irrelevant. 8:54 PM



Joe with police in Delaware (2017)

¹⁴⁹⁹ "The Brady Handgun Violence Prevention Act of 1993, ushered into law by then-Sen. Joe Biden, at the time chairman of the Senate Judiciary Committee, made Form 4473 a key part of background checks for gun purchases[.]" See Devlin Barrett and Perry Stein, "Federal agents see chargeable tax, gun-purchase case against Hunter Biden," *Washington Post*, October 2022, [archive.ph/tEbhN](#)

¹⁵⁰⁰ "[T]he case was referred for a decision on prosecution to the Delaware Department of Justice."

See Dave Urbanski, "Hunter Biden's gun was taken by Hallie Biden in 2018, thrown into a supermarket garbage can, went missing — and no arrests were made," *TheBlaze*, October 2020, [archive.ph/P9YXL](#)